

Summary of Additional Information on Aggregate Incidents for Brodifacoum

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In 2005, the Office of Pesticide Programs sent a letter to Syngenta Crop Protection requesting additional information on 15 minor wildlife (WA) incidents related to brodifacoum exposure that Syngenta had originally reported in aggregate incident reports. Syngenta submitted additional information to OPP in a letter dated 18 January 2006. This letter became incident report # I017045. Syngenta did not supply additional information on some of the requested incidents because they claimed that they were actually domestic animal incidents. They claim that they inadvertently recorded these as WB incidents when they were actually DA incidents. Other incidents reported in this package proved to be duplicates of incidents already obtained from other sources and entered into the Ecological Incident Information System (EIIS). The below table summarizes the new information that OPP obtained from this submittal. Only two of the incidents were found to be new ecological incidents. A third new incident was not technically an ecological incident because it involved effects on a death turtle, but the information it provides on possible secondary poisoning to turtles nonetheless might be useful for ecological risk assessments. The information obtained on these three new incidents will be entered into EIIS.

Package Number of Aggregate Incident	Product Sequence	Product Name	Start Date	Original WB Count	Revised Severity Category	New Incident Number	New Eco Incident?	New information obtained
016249	013	Brodifacoum	1/1/2005	1	WB	I017045-001	No	No new information. Reports information from a 1 February 2005 Los Angeles Times article which we already have (part of I016092-001). Syngenta also provided a copy of the laboratory diagnostic report from CAHFS, which is a duplicate of incident report I016091-001.
014038	001	Brodifacoum	1/1/2003	1	WB	I017045-002	No	This is a duplicate report of the screech owl poisoning reported in I012660-001. Reports on the death of a screech owl in

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								New York City. The source of the information was a New York Daily News article on November 10, 2002. A copy of this article was not provided, but I have purchased it online.
013556	015	Brodifacoum	7/1/2002	1	WB	I017045-003	Yes	The Agriculture Division of Los Angeles County, CA reports that a hawk was killed by secondary exposure to rodenticides. The bird was found dead about a month after Contrac rodenticide bait traps were placed behind a strip mall. A wildlife rehabilitator determined that the bird had died from eating dead rats that were poisoned by the product.
012923	004	Talon-G Rodenticide Bait Mini-Pellets	1/1/2002	1	DD		No	Syngenta claims that an error was made in reporting this incident to EPA. They claim that these incidents should have been recorded as DD rather than WB. They provided a printout from their PROSAR database that shows that these incidents were indeed originally recorded as "DD" but were inadvertently entered as "WB" in the aggregate report they submitted. Syngenta also stated that two incidents were combined because they learned that resulted from the same exposure.
	005	Talon-G Rodenticide Bait Pack Pellet with Bitrex	1/1/2002	1	DD		No	
	007	Havoc Rodenticide Bait Pellets	1/1/2002	1	DD		No	
	008	Talon-G Rodenticide Mini-Pellets with Bitrex	1/1/2002	2	DD (2)		No	
	016	Weatherblock XT	1/1/2002	1	DD		No	
	022	Brodifacoum	1/1/2002	3 (out of 4 total)	DD (2, originally reported as 3)		No	
012923	022	Brodifacoum	1/1/2002	1 (out of 4 total)	WB	I017045-004	Yes	A caller reported that the Raptor Recovery Center in Santa Barbara,

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								California released a hawk and an owl near a school. Rodenticide was used on the school grounds. The hawk and owl were later recovered with “bleeding symptoms.” The hawk died. Residue analysis found 0.278 ppm of brodifacoum in the liver of the hawk.
12523	020	Commercial Zap Rat & Mouse Killer	7/1/2001	1	DA	I017045-005	Yes*	A owner of a turtle threw a dead rat into the turtle’s enclosure. The owner alleges a ridgeback turtle ate part of the dead rat and died.
011978	025	Zep Commercial Weatherproof Rat & Mouse Bars	4/1/2001	1	DE	I017045-005	No	A owner of a turtle alleges that the turtle ate the head of a dead rat that fell into the turtle’s cage. The rat may have ingested rodenticide bait that had been put out earlier. I will not enter this incident into EIIS because no symptoms were reported for the turtle.

* Although this incident is technically a domestic animal incident since it involves a pet turtle, the fact that a turtle was allegedly died from secondary poisoning to rodenticides has significant implication to wild turtles. It will thus be entered into EIIS.